

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., ¹)	Case No. 25-10068 (CTG)
)	
Post-Effective Date Debtor.)	
)	Re: Docket No. 1881

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR’S
TWENTIETH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN CLAIMS
(Reclassified Claims)**

The undersigned counsel to the Plan Administrator in the above-captioned case hereby certifies as follows:

1. On December 12, 2025, the *Plan Administrator’s Twentieth (Substantive) Omnibus Objection to Certain Claims (Reclassified Claims)* [Docket No. 1881] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was January 5, 2026 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. On January 2, 2026, Bayfield Company LLC (“Bayfield”) filed a response to the Objection [Docket No. 1923].

4. Additionally, prior to the Response Deadline, the Plan Administrator received informal responses to the Objection and Proposed Order from the following claimants, or their

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

counsel, including: (i) Christopher DiTullio (Claim No. 4152), (ii) Scott Sekella (Claim No. 3963), (iii) Hapag-Lloyd AG (Claim Nos. 11472, 19797), and (iv) RB Merchants LLC, YPF Merchants LLC and Merchants Owner LLC (collectively with Bayfield, the “Claimants”).

5. No other claimant has responded to the Plan Administrator’s Objection.

6. The Plan Administrator’s Objection with respect to the Claimant’s claims has been adjourned to the omnibus hearing scheduled for January 28, 2026 at 10:00 a.m. (ET).

7. A revised Proposed Order removing the Claimants’ claims is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

8. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

9. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: January 9, 2026
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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